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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIAN  
 SANTIAGO, and SUSAN LYNN HARVEY  
 individually and on behalf of all other  
 similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688-RS

**DECLARATION OF MARK MAO IN  
 SUPPORT OF PLAINTIFFS' MOTION  
 FOR PERMANENT INJUNCTION AND  
 DISGORGEMENT OF PROFITS**

Judge: Hon. Richard Seeborg  
 Courtroom 3 – 17th Floor

**DECLARATION OF MARK MAO**

I, Mark Mao, declare as follows.

1. I am a partner with the law firm of Boies Schiller Flexner LLP (“BSF”), counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of California. I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this Declaration in support of Plaintiffs’ Motion for Permanent Injunction and Disgorgement of Profits.

3. Attached hereto as **Exhibit 1** is a true and correct copy of Google’s current Privacy Policy, effective July 1, 2025.

4. Attached hereto as **Exhibit 2** is a true and correct copy of Google’s current WAA Help Page.

5. Attached hereto as **Exhibit 3** is a true and correct copy of Google’s Supplemental Responses and Objections to Plaintiff’s Interrogatories, Set Six, dated November 1, 2022.

6. Attached hereto as **Exhibit 4** are true and correct excerpts from the transcript of the deposition of Google employee (and trial witness) David Monsees, taken by Plaintiffs on September 15, 2022.

7. Attached hereto as **Exhibit 5** is a copy of the clip report reflecting the portion of former Google employee Eric Miraglia’s October 25, 2022 deposition testimony that was played at trial in this matter on August 26, 2025 . This document was marked for identification as PX-388. *See* Tr. 1429:22-24.

8. Attached hereto as **Exhibit 6** is Plaintiffs’ proposed permanent injunction.

9. Attached hereto as **Exhibit 7** is a true and correct copy of an article published by Forbes, *Google Confirms It Has Been Hacked – What User Data Has Been Stolen*, by Davey Winder, dated August 9, 2025.

1           10. Attached hereto as **Exhibit 8** is a true and correct copy of the current version of  
2 Google's "Activity controls" webpage.

3           11. Attached hereto as **Exhibit 9** are true and correct excerpts from transcript of the  
4 deposition of Plaintiffs' damages expert (and trial witness) Michael Lasinski, taken by Google on  
5 June 29, 2023.

6           12. Attached hereto as **Exhibit 10** is a copy of the clip report reflecting the portion of  
7 Google CEO Sundar Pichai's December 11, 2018 Congressional testimony that was played at trial  
8 in this matter on August 19, 2025 . This document was marked for identification as PX-45. *See* Tr.  
9 360:7-9.

10           13. Attached hereto as **Exhibit 11** are true and correct excerpts from the deposition  
11 transcript of Google's damages expert (and trial witness) Christopher R. Knittel, taken by Plaintiffs  
12 on July 11, 2023.

13           14. Attached hereto as **Exhibit 12** is a true and correct copy of Michael Lasinski's  
14 (Plaintiffs' damages expert) Second Supplemental Expert Report, dated April 25, 2025.

15           15. Attached hereto as **Exhibit 13** is a true and correct copy of the Supplemental  
16 Rebuttal Expert Report of Christopher R. Knittel (Google's damages expert), dated June 19, 2025.

17           16. Attached hereto as **Exhibit 14** is a true and correct excerpt of Google's Second  
18 Supplemental Responses to Plaintiffs' Interrogatories, Set Six, dated February 14, 2023.

19           17. Attached hereto as **Exhibit 15** is a true and correct copy of excerpts from the  
20 deposition transcript of Google employee (and trial witness) Steve Ganem, taken by Plaintiffs on  
21 October 28, 2022.

22           18. Attached hereto as **Exhibit 16** is a true and correct copy of Google's Responses  
23 and Objections to Plaintiff's Requests for Production of Documents, Set Eight, dated July 13,  
24 2022.

25           19. Attached hereto as **Exhibit 17** is a true and correct copy of an email exchange  
26 between Google's counsel and Plaintiffs' counsel, dated August 16, 2022.

